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13 *Maria C. Van Zandt*

14 **IN THE UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**  
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17 MARIA C. VAN ZANDT,  
18 Plaintiff,

19 vs.

20 QUANTUM COLLECTIONS, INC.;  
21 BARCLAYS BANK, DELAWARE;  
22 FORD MOTOR CREDIT-OMAHA  
SERVICE CENTER; FORD MOTOR  
23 CREDIT COMPANY; EQUIFAX  
INFORMATION SERVICES, LLC;  
24 EXPERIAN INFORMATION  
SOLUTIONS, INC.,

25 Defendants.  
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Case No.: 2:16-cv-01116-APG-NJK

**STIPULATION TO EXTEND  
DEFENDANT BARCLAYS  
BANK DELAWARE'S TIME TO  
RESPOND TO COMPLAINT**

**(FIRST REQUEST)**

Compl. Filed: May 18, 2016

1 This Stipulation to Extend Time to Respond to Complaint is made by and  
2 between Plaintiff Maria C. Van Zandt (“Plaintiff”) and Defendant Barclays Bank  
3 Delaware (“Barclays”) through their respective counsel, in light of the following  
4 facts:

5 RECITALS

6 A. Plaintiff filed the Complaint (“Complaint”) against Barclays on or  
7 about May 18, 2016.

8 B. Barclays was served with the Complaint on June 7, 2016.

9 C. Barclays’ current deadline to respond is June 28, 2016.

10 D. The parties agreed to extend Barclays’ time to respond to the  
11 Complaint through July 26, 2016, in order to give Barclays time to investigate  
12 Plaintiff’s claims and prepare a proper response, and for the parties to discuss a  
13 potential resolution of this matter.

14 E. There is good cause to grant this stipulation because Barclays  
15 requires additional time to investigate Plaintiff’s claims and prepare a proper  
16 response, and the parties require additional time to consider a resolution of this  
17 matter.

18 F. Pursuant to Civil Local Rules 6.2 and 7.1, Plaintiff and Barclays  
19 respectfully request that the Court extend Barclays’ time to respond to Plaintiff’s  
20 Complaint through July 26, 2016.

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STIPULATION

NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays has up to and including July 26, 2016, to file a response to Plaintiff's Complaint.

**IT IS SO STIPULATED.**

DATED: June 28, 2016

LEWIS ROCA  
ROTHGERBER CHRISTIE LLP

By: /s/ J Christopher Jorgensen  
J Christopher Jorgensen  
Attorneys for Defendant  
Barclays Bank Delaware

DATED: June 28, 2016

HAINES & KRIEGER, LLC

By: /s/ David H. Krieger  
David H. Krieger, Esq.  
Attorneys for Plaintiff  
Maria C. Van Zandt

ORDER

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATE: June 30, 2016